

HOLLIS et al.  
Appl. No. 09/585,329  
December 1, 2003

### **REMARKS/ARGUMENTS**

Applicant has amended his claims to more particularly point out the invention, and requests the USPTO to reconsider and allow this application in view of the claim amendments and the following remarks.

The only outstanding rejection is the USPTO's allegation that the pending claims are "obvious" in view of U.S. Patent No. 6,452,602 to Morein. Morein discloses a variable length texture compression technique that compresses different data blocks using different compression schemes to achieve higher compression ratios. See column 1, lines 49-53. An addressing technique is used to allow more easy addressing of the differently compressed data blocks. See column 4, line 35 and following.

The Examiner concedes that Morein "fails to disclose a first length if an alpha component is present and a second length if the alpha component is not present..." but asserts that "it would have been obvious to one of ordinary skill in the art at the time of the invention to include in the data block structure of compressed fixed and variable length compression schemes as disclosed in Morein, the compression of the alpha component for color to maximize efficiency of the memory usage by fetching color components directly from memory without compression." Outstanding Office Action at 3.

Even assuming that the Examiner is correct that it would have been obvious to include alpha semi-transparency information in Morein's compressed texture data, the present invention as recited in independent claims 1, 5, 14 and 18 as amended would still not be obtained. For example, applicant has amended independent claim 1 to recite "wherein the RGB color component portion uses the bit count otherwise available for the multi-bit alpha component to provide increased color resolution when the multi-bit alpha component field is not present." Applicant has amended independent claim 5 to recite "said elements each having a predetermined length unaffected by whether or not they provide said further, multi-bit field encoding semi-transparency." Independent claim 14 recites "wherein said format has a predetermined fixed length and the RGB color

HOLLIS et al.  
Appl. No. 09/585,329  
December 1, 2003

information field uses bit resolution otherwise available for encoding semi-transparency when said indicator indicates the instance does not encode semi-transparency.”

Independent claim 18 recites “wherein the image element overall bit length is unaffected by whether or not it encodes semi-transparency.” These recited features are supported in applicant’s originally filed specification at for example page 7, lines 8-11 and page 9, lines 6 and following.

These features in combination are not taught or suggested by Morein. In fact, Morein appears to teach away by expressly teaching a variable length data format. In contrast, applicant’s exemplary illustrative non-limiting disclosed format implementation has a length that is not affected by whether or not semi-transparency is being encoded. Rather, applicant simply reallocates bits between RGB color and alpha semi-transparency on an instance-by-instance basis to avoid altogether the addressing complexity that Morein points out is inherent with variable-length formatting. Such addressing complexity is non-trivial given the high memory access rates required to, for example, efficiently process graphics data in a graphics pipeline-based system.

The Examiner has also rejected independent claim 21 in view of Morein. However, claim 21 expressly requires a converter for “quantizing or dequantizing first resolution semi-transparency information into a predetermined number of equal sized steps to form second resolution semi-transparency information.” This aspect of the exemplary illustrative non-limiting disclosed embodiment is described for example at page 17, line 21 of applicant’s specification. Applicant can find no teaching in Morein of providing this type of semi-transparency conversion for use in, for example, converting between lower and higher resolution values as disclosed in applicant’s specification. The portion of Morein cited by the Examiner (column 3, lines 39-52) appears to relate to selecting between different compression schemes to achieve the smallest resulting output data set size. This teaching has nothing to do with applicant’s claimed feature of how to convert between different resolutions of semi-transparency information.

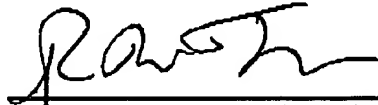
Applicant has fully addressed the only outstanding issue through claim amendments and the remarks above. Should any additional issue(s) remain outstanding,

HOLLIS et al.  
Appl. No. 09/585,329  
December 1, 2003

the Examiner is encouraged to contact the undersigned at the telephone number listed below so that such issue(s) can be resolved without need of a further written action.

Respectfully submitted,

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